

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In Re: Patrick Roch

Case No. 19-11944-KHK
Chapter 13

OBJECTION BY SECURED CREDITOR TO PROPOSED PLAN

Comes now the secured creditor, MB Financial to Fifth Third Bank: Fifth Third Bank Successor by merger to MB Financial, which holds a Deed of Trust secured by the Debtor's real property at 102 Reflection Way, Sterling, Virginia 20164, by and through its attorney, Dinh Ngo, Esq., and objects to the proposed plan and to confirmation and for reason therefore states as follows:

1. The Debtor has proposed a plan which includes a total payment of \$16,502.48 for arrearages owed to MB Financial to Fifth Third Bank: Fifth Third Bank Successor by merger to MB Financial.

2. The secured creditor MB Financial to Fifth Third Bank: Fifth Third Bank Successor by merger to MB Financial anticipates filing a Proof of Claim with pre-petition arrearages due in the approximate amount of \$49,639.73.

3. The plan as proposed by the Debtor would therefore be insufficient to pay the claim of MB Financial to Fifth Third Bank: Fifth Third Bank Successor by merger to MB Financial.

Wherefore the Secured Creditor prays this court to enter an Order

1. Denying confirmation of the proposed Chapter 13 Plan, or alternatively
2. Modifying the Chapter 13 Plan to provide for payment in full of the Claim filed by the secured creditor, or alternatively
3. For such other and further relief as the Court deems appropriate.

Respectfully submitted:

/s/ Dinh Ngo, Esq. [dn 7/9/19]

Dinh Ngo, Esq.

Attorney for Secured Creditor

Bar No. 85661

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of July, 2019 I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing pleading will be served electronically by the Court's CM/ECF system on the following:

Thomas P. Gorman
300 N. Washington St. Ste. 400
Alexandria, Virginia 22314

Ashvin Pandurangi
AP Law Group, PLC
211 Park Ave.
Falls Church, Virginia 22046

I hereby further certify that on the 9th day of July, 2019, a copy of the foregoing pleading was also mailed first class mail, postage prepaid to:

Patrick Roch
102 Reflection Way
Sterling, Virginia 20164
(Via U.S Mail)

/s/ Dinh Ngo, Esq.
Dinh Ngo, Esq.